

AO 91 (Rev. 02/09) Criminal Complaint

FILED
 UNITED STATES DISTRICT COURT
 LAS CRUCES, NEW MEXICO

UNITED STATES DISTRICT COURT

for the
 District of New Mexico

MAY 27 2022

MITCHELL R. ELLERS
 CLERK OF COURT

United States of America

v.

Leif HAYMAN

Case No. 22-FF8 MJ

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 05/11/2022 in the county of Dona Ana in the _____ District of
New Mexico, the defendant violated Title 18 U. S. C. § 1958
 , an offense described as follows:

Use of interstate commerce facilities in the commission of murder-for-hire.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.


 Complainant's signature

B. Sterling Nixon, ATF Special Agent
 Printed name and title

Sworn to before me ^{VIA TELEPHONE} and signed in my presence.

Date: 5/27/22

City and state: Las Cruces, New Mexico


 Judge's signature

Gregory J. Fouratt, U.S. Magistrate Judge
 Printed name and title

CRIMINAL COMPLAINT - CONTINUED

UNITED STATES OF AMERICA

V.

Leif HAYMAN

AFFIDAVIT

1. Your Affiant, Boyd Sterling Nixon, is a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and has been so employed since May 17, 2015. Prior to May, your Affiant worked for approximately four and a half years as an Agent with the United States Border Patrol. Your Affiant obtained a Bachelor's Degree in English from Brigham Young University. As part of the training to become an ATF Special Agent, your Affiant attended six months of specialized training sponsored by the Federal Law Enforcement Training Center in Glynco, Georgia. As a result of this training, your Affiant has been certified as a federal investigator and has received specific training involving violations of federal laws. Your Affiant has also received ATF specific training in the determination of probable cause and in the use of warrants and complaints to enforce federal laws. Your Affiant is currently assigned to the Las Cruces, New Mexico Field Office.
2. Your Affiant, being duly sworn, states the following to be true and correct to the best of his knowledge and belief based upon his personal observations and from information provided by knowledgeable law enforcement agents and officers who are involved in the investigation of **Leif HAYMAN**. The facts outlined in this narrative are not meant to be a complete narrative of all that has occurred in connection with this investigation, but are only a summary of facts necessary to set forth probable cause in support of the criminal complaint and does not purport to set forth all of the Affiant's knowledge regarding this investigation.

RELEVANT STATUTES AND DEFINITIONS

3. As a result of my training and experience as an ATF Special Agent, I am familiar with federal criminal laws and know that it is a violation of Title 18 United States Code § 1958, to use the mail or any facility of interstate or foreign commerce, with intent that a murder be committed

CRIMINAL COMPLAINT - CONTINUED

in violation of the laws of any State or the United States as consideration for the receipt of, or as consideration for a promise or agreement to pay anything of pecuniary value, or to conspire to do so.

OVERVIEW OF THE INVESTIGATION

4. On May 3, 2022, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Special Agent (SA) Sterling Nixon received information regarding Leif HAYMAN, who was attempting to hire someone to eliminate another individual (hereinafter "Victim").
5. The information was derived from a website entitled rentahitman.com and was provided by the owner and operator of the website. Initially, the owner of the website attempted to relay the information to other law enforcement agencies in the Las Cruces, NM area but was unsuccessful. The owner and operator of the website resides in the state of California. The owner provided documentation that reported that on Sunday, April 10, 2022, at approximately 3:42 PM, a Leif HAYMAN, using the alias Leif E. Trujillo, provided his address, email (leiftree29@gmail.com), and phone number (575-323-8565) to the rentahitman.com website in the attempt to get someone to "hurt" an individual. HAYMAN wrote that, "I want her gone now too much that I don't like about her she's controlling my wife."
6. HAYMAN provided an address, a phone number, and an email address for the victim. HAYMAN also included a picture of the victim and a secret code phrase ("leave the buddy") to be used in the event someone from the website contacted him.
7. On April 17, 2022, at approximately 4:17 PM, HAYMAN again reached out to the aforementioned website. This time he provided the alias Meliodas T. Trinidad, but utilized the same email, leiftree29@gmail.com, and address in Las Cruces, NM 88001. HAYMAN provided additional information about the victim, to include her phone number, address, and a photograph. HAYMAN wrote, "Kill that bitch."
8. On April 19-28, 2022, HAYMAN sent multiple emails to rentahitman.com website discussing the aforementioned issue. On April 20, 2022, HAYMAN wrote, "...this issue can't wait needs

CRIMINAL COMPLAINT - CONTINUED

to happen this week 5 days is too long for me to wait....” On April 28, 2022, HAYMAN wrote, “You people are fake if u were real someone who have contact me already I can’t wait anymore I’m doing it my fucking self thank you for nothing fake people.”

9. On May 5, 2022, ATF Investigative Assistant (IA) Maria Guerrero assisted ATF agents in identifying the aforementioned subject as being Leif HAYMAN. IA Guerrero confirmed the identity of the victim of the murder-for-hire. The victim’s daughter was also identified. IA Guerrero conducted an internet search verifying a connection to HAYMAN through the daughter of the victim. The victim’s daughter is shown to be engaged to HAYMAN via the website www.theknot.com.
10. IA Guerrero conducted a Facebook search that showed the relationship between the target of the murder-for-hire plot, the victim, and the victim’s daughter. HAYMAN is seen in photographs on the victim’s daughter’s Facebook profile.
11. On May 5, 2020, ATF SA 5118, in an undercover (UC) capacity, contacted Leif HAYMAN by calling telephone number (575)323-8565 and left a voice message stating that this message is for “leave the buddy” call me back. “Leave the buddy” is the secret code phrase provided by HAYMAN on the aforementioned website. SA 5118 text messaged telephone number (575) 323-8565 stating, “safe word leave the buddy. R U still interested in my services.” The response to the message was, “Yes I am still interested.”
12. At approximately 6:49 PM, SA 5118 received a call from number (575)571-4201. The following information is a summary of the recorded telephone call and not a verbatim account.
13. The caller identified himself as Leif (HAYMAN) and asked who he was speaking to. SA 5118 told HAYMAN that he was the one that reached out to the website. HAYMAN said yes, I need your help. SA 5118 asked HAYMAN if he remembered his secret code phrase and he answered, “Leave the buddy.”
14. SA 5118 asked HAYMAN what he needed help with, and HAYMAN said he needed someone scared or eliminated. SA 5118 asked if he wanted them to be gone off this earth right, and

CRIMINAL COMPLAINT - CONTINUED

HAYMAN said yes, I do. HAYMAN was asked when he needed this done by and he answered as soon as possible.

15. SA 5118 asked HAYMAN how he was going to make payment. HAYMAN said he was informed this was "free," but that he had a way to pay. SA 5118 said he needed money for provisions for the job. HAYMAN asked how much he needed and whether he had to pay before or after the job. HAYMAN stated that the job was urgent and that he should pay after.
16. SA 5118 answered that he normally takes payment before and that price depends on the job and how you want it done. SA 5118 further stated that he takes half upfront and the other half once he shows proof of what has been done.
17. HAYMAN suggested \$200.00 as a starting price. HAYMAN said, I will talk to my wife about mailing me some money. I will give you my address and you can stop by; it will be in the mailbox. SA 5118 asked HAYMAN what tools he wanted to use and whether he wanted the victim to suffer. HAYMAN said he wanted it done as quickly as possible and no evidence. HAYMAN also said, "It's my wife's mom we're talking about, so I don't want any evidence to come back to me or you."
18. HAYMAN asked if he had to be with SA 5118 when the killing was done. SA 5118 told HAYMAN that he normally does it alone, but that HAYMAN could be present if he wished. SA 5118 further told HAYMAN that he would take polaroid pictures when it's done and show him the proof.
19. HAYMAN said his wife lives in Bayard and he lives in Las Cruces. HAYMAN offered to distract his wife long enough for the job to be done so that she wouldn't know what came her way.
20. SA 5118 told HAYMAN he needed an address for the victim, a recent photograph of her, and place of employment if she worked. HAYMAN informed the best place to kill her would be at her residence.

CRIMINAL COMPLAINT - CONTINUED

21. SA 5118 asked HAYMAN if he wanted the job done with a gun, baseball bat, or knife. HAYMAN said, "tell me the fastest way and I'll tell you yes or no." SA 5118 said the fastest and cleanest is with a gun. HAYMAN said, "yes let's go for it." SA 5118 said, "one shot to the head and that's it." HAYMAN said, "I know, right."
22. SA 5118 asked HAYMAN if he would be able to provide a gun and HAYMAN said he doesn't have a gun but they have guns there. SA 5118 said, "part of my cost is I'm going to have to find a gun on the streets, I'm going to have to spend money on a gun." HAYMAN asked how much that was going to run and SA 5118 answered a good gun would cost \$500.00. SA 5118 elaborated that he would need a gun that would not jam and a big enough caliber to do the job such as a 40 or 45 caliber gun.
23. HAYMAN said, "I have knives, I don't have a bat, I have a rock you can smash her head in with multiple times." SA 5118 informed HAYMAN that method would be messy. HAYMAN said he wanted to do this as soon as possible.
24. HAYMAN said they live in Bayard (New Mexico) and he lives in Las Cruces. SA 5118 confirmed who he wanted gone and HAYMAN answered my wife's mom. HAYMAN said he could email SA 5118 the address. SA 5118 said he would email HAYMAN tomorrow (May 6, 2022) and told HAYMAN to get an address and a recent photograph.
25. HAYMAN said he would lie to his wife and say he needed money for something else. HAYMAN said his wife did not know what was going on. HAYMAN said that he can have the money by Monday or Tuesday. SA 5118 asked HAYMAN to see how much money he can get together and that he would take care of getting the gun. SA 5118 further asked HAYMAN for the intended victim's address and a recent photograph of her. HAYMAN answered yes. HAYMAN said, "I did not think you guys were going to get to me, I was about to do what you're about to do. I was like I have to wait. I have no way of getting there."
26. HAYMAN said, "as long as I don't tell my wife what's coming, she does not know this is coming her way." SA 5118 asked HAYMAN whether he was going to be able to look his wife in the face and not break down and confess to her. HAYMAN answered, "Yeah."

CRIMINAL COMPLAINT - CONTINUED

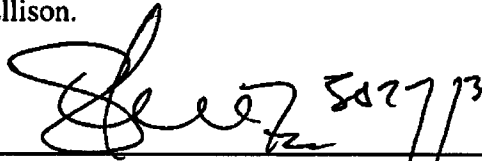
27. HAYMAN said "I hate her mom with a passion," and that, "fucking bitch deserves to die after what she did to me and her (HAYMAN's wife) a few weeks ago. She deserves to die". SA 5118 told HAYMAN to get his end of the stuff together and they would talk on Monday. HAYMAN said, "OK, that's cool thank you." SA 5118 concluded the telephone call.
28. On May 6, 2022, HAYMAN text messaged SA 5118 a photograph of the intended victim of the murder-for-hire from telephone number (575) 323-8565. HAYMAN also text messaged his email address Trujillolee411@gmail.com. SA 5118 emailed the address HAYMAN provided to SA 5118 and asked for the address or directions. HAYMAN later emailed SA 5118 with the address of the victim of the murder-for-hire. HAYMAN also typed, "change of plans she is only giving me 53 dollars so let's use to baseball bat and I'll give you the rest of the money after we do it."
29. On May 9, 2022, SA 5118 had telephone contact with HAYMAN. HAYMAN said he lives alone but he has a staff with him 24/7. HAYMAN said, "you're pretty much going to have to hurt that person too. You will have to come inside the house and pretty much do that thing to this person because I have a staff 24/7. My only chance of getting out of here you have to hurt that person too."
30. SA 5118 informed HAYMAN that was too many people and that it would be noticed. HAYMAN responded, "I live in a quiet neighborhood no one is going to notice shit." HAYMAN asked SA 5118 to at least scare that person not to tell anybody that he was gone, because "the moment they notice I am gone they are going to call the police."
31. SA 5118 and HAYMAN agreed that HAYMAN would sneak out of the house.
32. On May 11, 2022, ATF Agents conducted an operation where SA 5118 was going to pick up HAYMAN to "murder" the victim. SA 5118 parked in front of HAYMAN's residence and noticed HAYMAN pointing at another male subject walking in front of him like he wanted the SA 5118 to do something to that person. HAYMAN and the male subject approached the undercover vehicle, and SA 5118 rolled the driver's side window down. HAYMAN asked, "where were you I was waiting for you?" The other male subject was trying to keep HAYMAN

CRIMINAL COMPLAINT - CONTINUED

away from the vehicle. HAYMAN said, "this is part of the deal." The two began to shove each other around and SA 5118 drove away.

33. This violation occurred in the city of Las Cruces, in the County of Dona Ana, in the District of New Mexico.

34. This criminal complaint was reviewed and approved by Assistant United States Attorneys Maria Armijo and Ry Ellison.

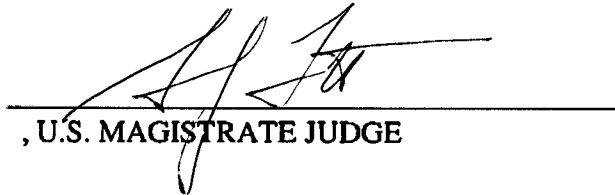
A handwritten signature in black ink, appearing to read "B. Sterling Nixon", written over a horizontal line.

B. Sterling Nixon, Special Agent
Bureau of Alcohol, Tobacco, Firearms and Explosives

VIA TELEPHONE

Subscribed and sworn to before

me this 27th day of May ~~2021~~, 2022

A handwritten signature in black ink, written over a horizontal line.
, U.S. MAGISTRATE JUDGE